

Application No. 09/867,303
Amendment "C" dated October 24, 2005
Reply to Office Action mailed July 25, 2005

REMARKS

The Office Action of July 25, 2005, considered and rejected claims 27-54, and objected to claims 35 and 50. Claims 35 and 50 were objected to on the basis of a grammatical informality in each claim. Applicants have amended claims 35 and 50 to correct the minor grammatical informalities; accordingly, and in view of the foregoing amendments, reconsideration of claims 35 and 50 is respectfully requested.

Claims 27-34 were rejected as unpatentable and obvious under 35 U.S.C. § 103(a). In particular, claims 27-34, 37-41, 43-49, and 51-53 were rejected as being unpatentable over the "Universal Plug and Play Device Architecture" document (the "UPnP architecture"), which is cited in the Applicants' IDS of 5/23/2003, and also over Kekic et al. (U.S. Patent No. 6,272,537). Claims 35-36, 42, 50, and 54 were rejected as being unpatentable over the UPnP architecture and Kekic, in light of the Microsoft Word 2000 application.¹

By this paper, claims 27, 32, 35, 43, 47, and 50 have been amended. By this paper, claim 55 has also been added,² such that claims 27-55 now remain pending for examination, and of which claims 27 and 43 are the only independent claims at issue.

As recited in claim 27, the generic user control point tool comprises:

a user interface that displays, in a first window, a plurality of user-selectable device search fields, the plurality of selectable fields including a plurality of selectable search type options that correspond to different types of searches for discovering UPnP devices on the system, wherein in response to user selection of any of the selectable search type options, the generic user control point tool collects UPnP device information that is displayed as a list of selectable UPnP devices at the first window of the user interface.

¹ Although the prior art status and some of the assertions made with regard to the cited art is not being challenged at this time, Applicants reserve the right to challenge the prior art status and assertions made with regard to the cited art, as well as any official notice, which was taken in the Office Action, at any appropriate time in the future, should the need arise, such as, for example in a subsequent amendment or during prosecution of a related application. Accordingly, Applicants' decision not to respond to any particular assertions or rejections in this paper should not be construed as Applicant acquiescing to said assertions or rejections, or to the prior art status of any cited art.

² Support for the claim amendments and new claims, including those related to a plurality of user-selectable search fields and automatic display of properties, are clearly supported by Figures 2 and 3, and by Page 14, line 19 to Page 16, line 20, among other passages, of the originally filed specification. Claim 44 has been amended merely to correct a typographical error. Accordingly, it is respectfully submitted that the amendments to the claims, and the addition of new claims, do not add new matter, and entry thereof is respectfully submitted.

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Applicants respectfully submit that the claimed invention is neither taught nor suggested by the art of record. In particular, the "client graphical user interface" (including the MIB browser and auto-discovery panel) taught in Kekic clearly fails to describe or suggest such a user interface that displays a plurality of different, user-selectable search fields, the plurality of selectable fields including a plurality of selectable search type options, that in response to user selection of one of the search type options collects UPnP device information that is displayed as a list of selectable UPnP devices at the user interface. In contrast, auto-discovery panel 2700, as shown in Figure 27, appears to illustrate a single, selectable limited search field 2703 having defined selections of Yes and No, rather than a user interface having a plurality of user-selectable search fields, as claimed. See Col. 43, ln. 36 – Col. 45, ln. 17).

Also in Kekic, MIB browser 3600, as shown in Figure 36, is similarly limited, and includes only a single, selectable search box 3603 for selecting an MIB file, while the information must be typed into the remaining fields. Col. 51, ln. 43 – Col. 52, ln. 11. Accordingly, whereas the claims recite selectable search fields that include a plurality of *search type options*, MIB browser 3600 allows only selection of *files*. Moreover, the MIB browser does not appear to be a first window as recited in the claimed invention. In particular, auto-discovery panel 2700 (having a single, limited search box) is generated in work area 603 of client graphical user interface 600A or 600B, and is used to discover SNMP-enabled computer network elements and populate them in navigation tree 305. Col. 43, ln. 36 – Col. 45, ln. 17. Upon discovering elements, a user thereafter can access the MIB browser, by selecting button 312C to launch the MIB browser as a second interface in "another graphical user interface." Col. 22, ln. 41-52. Accordingly, a the MIB browser is not a user interface that displays, in a first window, a plurality of selectable device search fields, as claimed.

The other cited art also fails to teach or suggest such a generic user control point tool having a user interface as recited in the claims. In fact, with regard to the other cited art, the Examiner has stated: "[a]dditionally, the UPnP architecture document does not explicitly describe user interface features for discovering and controlling such devices." (Office Action, page 4). Accordingly, and for at least these reasons, UPnP architecture and Kekic do not, either alone or in combination, teach or suggest a user interface that displays, in a first window, a plurality of user-selectable device search fields, the plurality of selectable fields including a plurality of selectable search type options that correspond to different types of searches for

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discovering UPnP devices on the system, as claimed, and particularly in combination with the other recited elements.

Independent claim 43 is directed to a method for discovering, controlling, and displaying UPnP devices on a system using a generic user control point tool user interface, and generally corresponds to the elements of claim 27. Accordingly, claim 43 is also distinguished from the art of record for at least the same reasons.

Although the foregoing arguments are specifically related to claims 27 and 43, it will be appreciated that, for at least the foregoing reasons, all of the other rejections and assertions of record with respect to the dependent claims are now moot, particularly when considering the combination with elements recited in the corresponding independent claims. Therefore, the dependent claims need not be addressed individually. Nevertheless, for the record, Applicants will address some of the claims that depend from claims 27 and 43.

For example, with regard to claims 32 and 47, the UPnP architecture and Kekic also do not teach or suggest a generic user control point tool which automatically obtains and displays properties corresponding to a selected UPnP device when the selected UPnP device is selected from the list (in the first window per claim 27) and when the selectable properties button is selected. In fact, as noted by the Examiner, "the UPnP architecture document does not explicitly describe user interface features for presenting and presenting such information." Office Action, page 8. Further, with regard to displaying properties of any network element, Kekic appears to teach a first graphic user interface 600A or 600B, in which MIB browser button 312C is activated to display a second client graphic user interface (i.e. MIB browser 3600). Col. 51, ln. 43 – Col. 52, ln. 45. After the button 312C causes display of the second graphic user interface, a user must then enter at least an IP address and select an MIB file before contents of an MIB file are displayed. *Id.* Accordingly, Kekic teaches that after button 312C is activated in the first client graphic user interface, a new client interface is displayed; however, the contents of the MIB file are displayed only after additional user input and selection. Thus, Kekic fails to teach or suggest automatically obtaining and displaying properties corresponding to a selected UPnP device, as claimed; particularly in combination with the other recited claim elements.

With regard to claim 40, the cited references do not teach or suggest displaying a selectable list of actions that can be invoked. For example, Kekic describes a client graphic user interface in which a "set operation" is performed on an MIB variable. Col. 52, ln. 31-45.

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Particularly, a variable is selected from an MIB tree and displayed in field 3609. *Id.* The user may then override the displayed value by entering a new value in field 3610 and activating button 3611. *Id.* Accordingly, Kekic discloses a single, set operation on a variable, wherein the new value of the variable is entered by the user. Thus, Kekic fails to disclose displaying a selectable list of actions that can be invoked, as claimed.

With regard to claim 55, the cited art also fails to teach or suggest that, in combination with the foregoing, a generic user control point includes a user interface having, in a first window, a plurality of selectable device search fields includes a selectable list of device types for discovering UPnP devices on the system. In Kekic, for example, auto-discovery panel 2700 and MIB browser 3600 allow entry of an IP address, read community, device name, URL, etc., but do not teach or suggest a selectable list of device types for discovering system devices, as claimed.

For at least the foregoing reasons, Applicants respectfully submit that the pending claims 27-55 are neither anticipated by nor made obvious in view of the cited art of record. In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 24 day of October, 2005.

Respectfully submitted,



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